

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CHRISTOPHER M. WARMAN; TRUST  
FOR FAMILY OF CHRISTOPHER  
WARMAN; and CHOCOLATE  
MOONSHINE, LLC,

Plaintiffs,

v.

LOCAL YOKELS FUDGE, LLC;  
CHRISTINE FALVO; CHARLES BRIAN  
GRIFFIN; DONALD KONIECZNY; and  
CM CHOCOLATIER,

Defendants

No. 2:19-cv-01224-PLD

**CONSENTED TO MOTION TO STAY ENTRY OF JUDGMENT ON JURY AWARD**

And now come Defendants above-named and by their Counsel, Stanley M. Stein, Esquire, moves this Honorable Court for a Stay of Entry of Judgment on Jury Award, alleging in support thereof the following:

1. Following the entry of the jury's award in this case on December 8, 2023 (ECF# 288), subsequent litigation concerning Plaintiff Trust's motion for a permanent injunction, which motion the Court denied on March 26, 2024 (ECF#345,346,347 )
2. Thereafter, settlement communications among the parties took place with the assistance of the Court, but on November 7, 2024, those negotiations ended, thus allowing the Court to enter judgment on the jury award.
3. The entry of judgment on the jury award would begin a 14-day time period within which Defendants are required to file motions for counsel fees on causes of action dismissed on

summary judgment and for the denial of the motion for permanent injunction and for which counsel fees may be awarded.

4. The entry of judgment would also start a 28-day time period within which Defendants are required to file post-trial motions.
5. Defendants' Counsel, however, had months ago scheduled a pre-paid vacation which would occur during those time periods, which Counsel would be required to cancel to enable him to file the motions, particularly the post-trial motions, during the time period required.
6. The cancellation of the vacation would mean the loss of approximately \$3000 to Defendant's counsel for advance deposits which Counsel was required to make and air fare.
7. In addition, the time period for the post-trial motions would also overlap the Thanksgiving holiday.
8. Accordingly, Defendants request the Court to stay the entry of the judgment on the jury verdict until Monday, December 2, 2024.
9. Counsel for Plaintiff Trust consents to the within motion.

WHEREFORE, Counsel for Defendants request the Court to grant this motion in accordance with the proposed order submitted herewith.

Stanley M. Stein  
PA Bar ID # 10577  
**STANLEY M. STEIN, P.C.**  
2120 Lawnview Drive  
Elizabeth Township, PA 15135  
Tel: (412) 260-1947  
Email: [smstein@smsteinlaw.com](mailto:smstein@smsteinlaw.com)

By: /s/ Matthew Mazgaj  
Matthew Mazgaj  
PA Bar ID # 327068  
**MARCUS & SHAPIRA LLP**  
301 Grant Street, 35th Floor  
One Oxford Centre  
Pittsburgh, Pennsylvania 15219  
Telephone: (412) 338-5202  
Facsimile: (412) 391-8758

Email: [Mazgaj@marcus-shapira.com](mailto:Mazgaj@marcus-shapira.com)

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